

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

UNITED STATES OF AMERICA)	
)	No. 3:15-CR-154
v.)	
)	JUDGES REEVES / GUYTON
GEORGE MARCUS HALL)	

MOTION TO DISMISS

Comes now the United States of America, by and through its attorneys, Nancy Stallard Harr, Acting United States Attorney for the Eastern District of Tennessee, and Anne-Marie Svolto, Assistant United States Attorney, and moves the Court to enter an Order of Dismissal as to the following property:

2004 BMW, dark gray in color, VIN: WBAGN63454DS49875;
Tag# 162-SQR, registered to Palace Package Store, Inc.,
3210 Rudy St., Knoxville, TN 37921;

(hereinafter "property").

In support thereof, the United States would show that on November 5, 2015, an Information (Doc. 1) was filed in the above-styled case alleging forfeiture of the above-referenced property pursuant to 18 U.S.C. § 1955(d) and 28 U.S.C. § 2461(c), in any property, including money, used in the offense in violation of 18 U.S.C. § 1955(a), and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), in any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offense.

The United States also alleged forfeiture pursuant to 18 U.S.C. § 982(a)(1), in any property real or personal, involved in the offense of 18 U.S.C. § 1956(h), and any property traceable to such property.

The United States has since learned that there is insufficient equity in the property to justify the forfeiture; therefore, the United States no longer seeks forfeiture of the property.

WHEREFORE, the United States moves that the forfeiture allegations against the property listed above be dismissed.

A proposed order is presented herewith.

Respectfully submitted,

NANCY STALLARD HARR
Acting United States Attorney

By: s/ Anne-Marie Svolto
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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2016, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. All other parties will be served by regular U.S. mail.

s/Anne-Marie Svolto
ANNE-MARIE SVOLTO
Assistant United States Attorney